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Writer's Direct Dial

July 13, 2000

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VIA HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W. - The Portals
Washington, D.C. 20554

**Re: Notice of Ex Parte Presentation
(IB Docket No. 00-91).
Availability of INTELSAT Space Segment Capacity To Users and Service
Providers Seeking To Access INTELSAT Directly**

Dear Ms. Salas:

By its undersigned attorney, COMSAT Corporation ("COMSAT") hereby submits for filing in the above-referenced proceedings this notice of a written presentation submitted to Mr. Steven Spaeth and Mr. James Ball of the International Bureau on July 13, 2000. The written presentation was made in response to an inquiry from Mr. Spaeth, and is attached in its entirety.

In accordance with Section 1.1206(a)(1) of the Commission's rules, two complete copies of this notification are enclosed for filing in the above-referenced proceeding. Additional copies are being furnished under separate cover to the above-named Commission personnel.

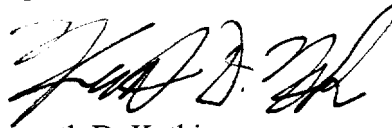
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Magalie R. Salas

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Please date-stamp the attached duplicate upon receipt and return it via messenger for our records. If any questions arise concerning this matter, kindly contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kenneth D. Katkin", written in a cursive style.

Kenneth D. Katkin

Enclosure

cc: James Ball
Steven Spaeth

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July 13, 2000

VIA HAND DELIVERY

Mr. Steven Spaeth
Satellite Policy Branch, Satellite & Radiocommunications Division
International Bureau
Federal Communications Commission
445 12th St., S.W.
Washington DC 20554

**Re: *Availability of INTELSAT Space Segment Capacity To Users and Service
Providers Seeking To Access INTELSAT Directly (IB Docket No. 00-91).***

Dear Mr. Spaeth:

This letter is in response to your inquiry yesterday concerning the data presented in Confidential Appendix B to the Comments of COMSAT Corporation filed on June 23, 2000 in the above-referenced proceeding. Specifically, you inquired why the data concerning the planned INTELSAT satellites IS-903, IS-904, IS-905, IS-906, IS-907, IS-ALPHA-1, and IS-ALPHA-2, is not presented in the format set forth by the Commission on Appendix B, Page 4 of the Commission's *Notice of Proposed Rulemaking* released on May 24, 2000 ("NPRM").

The Commission's Proposed Appendix B solicits information about COMSAT's "Current Lease," "Guaranteed Reservation," and "First Refusal Reservation" on all INTELSAT satellites, including the planned, non-operational satellites listed above. Of course, there can be

no “current leases” on satellites that are not yet in orbit. *See NPRM*, ¶¶ 11-14.¹ Moreover, COMSAT has not placed any “Guaranteed Reservations” or “First Refusal Reservations” for any Bulk Capacity on any such satellites. *See COMSAT Comments* at 15 n.4. Indeed, because none of these satellites will be deployed within the next six months, INTELSAT policy prohibits the placement of any FRR reservations at this early date. *See id.* at 18. For this reason, pages 3 through 5 of Confidential Appendix B provide a complete account of every “Current Lease,” “Guaranteed Reservation,” and “First Refusal Reservation” held by COMSAT. No “future” satellites are reflected on those three pages because COMSAT holds no such leases or reservations for Bulk Capacity on any such satellites.

As discussed in COMSAT’s Comments, about 30% of INTELSAT’s capacity is provided in the form of Standardized Circuits, rather than Bulk Capacity leases. *See COMSAT Comments* at 4 n.6, 19. “Unlike Bulk Capacity, individual Standardized Circuits may not be reserved in advance. . . .” *Id.* at 4 n.6. Accordingly, “the ‘process’ to which the *Capacity NPRM* refers (*i.e.*, placing FRR or GR reservations) does not even apply to INTELSAT’s provision of Standardized Circuits.” *Id.* at 19. For this reason, notwithstanding that the Commission’s inquiries did not address the issue, COMSAT sought to assist the Commission by providing (on pages 1 and 2 of Exhibit B) data detailing all of COMSAT’s Standardized Circuit commitments.² However, it was not possible to provide such data in terms of “Guaranteed Reservations” or “First Refusal Reservations,” neither of which can be placed for Standardized Circuits.

Unlike Bulk Capacity leases, Standardized Circuit commitments are not identified with specific satellites or orbital locations until such circuits become active. Standardized Circuit commitments may be used on any of several satellites. Appendix B sets forth the orbital locations at which each of COMSAT’s Standardized Circuits is being utilized. Approximately 60% of the Standardized Circuits disclosed on pages 1 and 2 of Confidential Appendix B are

¹¹ INTELSAT’s Bulk Capacity leases are identified with specific orbital locations rather than specific satellites. For this reason, if an operational INTELSAT satellite is replaced during the term of an existing lease, then COMSAT may continue to obtain Bulk Capacity on the replacement satellite pursuant to the terms of the existing lease. No separate lease, however, specifically identifies the replacement satellite. The details of COMSAT’s existing location-specific Bulk Capacity leases are set forth on pages 3 through 5 of Confidential Appendix B.

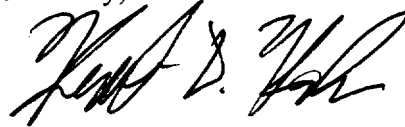
² The publicly-filed (redacted) version of page 2 of Exhibit B explains that “Circuit Data does not have FRR or GR status associated with it. All circuit data is active capacity.” These two explanatory sentences inadvertently were not appended to the Confidential version of page 2 of Exhibit B.

Mr. Steven Spaeth
July 13, 2000
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under long term commitment to INTELSAT and will not expire until 2010, which is well beyond the deployment of the planned "INTELSAT 9" and "INTELSAT 10"-series satellites. Therefore, it is likely that some portion of COMSAT's long term circuit commitments will end up operating on these planned satellites, just as some portion will operate on existing satellites. COMSAT's long-term commitments with INTELSAT specify that COMSAT has the flexibility to redirect the placement of these circuits to reflect future customer demand.

I hope this clarifies these matters. Please call me if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth D. Katkin", written in a cursive style.

Kenneth D. Katkin

cc: James L. Ball, Lawrence W. Secrest III, Keith Fagan, Ruth Pritchard-Kelly, Maury D. Shenk, Robert Koppel, James W. Hedlund, William M. Wiltshire